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March 20, 2018

Honorable Ronnie Abrams
United States District Court Judge
United States Courthouse
40 Foley Square
New York, New York 10007

Re: United States v. John Galanis,
16 CR 371 (RA)

Your Honor,

I write to join in the applications made by my co-counsel to adjourn the upcoming trial date. Due to the government's almost weekly service of large amounts of new Discovery over the past few months it is impossible for counsel to be prepared to present a defense if the trial date is not postponed. For the government has not only continued to serve on defense counsel large Discovery packets that continually increase the amount of information that not only needs to be read, but cataloged, the government does so using a method that makes this process even more time consuming than it needs to be because they send these Discovery packets with no bibliography as to what is being given. Thus, counsel is forced to go through each and every document to see if and how it impacts his client. If the Government would at least list what each document is, some time could be saved. This problem is further compounded by the fact that the new Discovery packets have continued to arrive just as the deadline's for certain motions are quickly approaching, jury instructions are due, the government is supplying its Exhibit List (which has been provided in a form that makes deciphering exactly what documents are being used very difficult) and the trial Discovery is about to be delivered to defense counsel. The government has taken what was a plausible and efficient timetable leading up to the trial date and made a mockery of it by continually serving defense counsel with more and more Discovery well beyond the time period that was set by this Court and the trial schedule was based on. If the trial date is not postponed counsel will be forced to go to trial ill prepared and therefore his client will not receive his constitutionally guaranteed right to a fair trial. This Court has throughout this case given counsel all the tools asked of it so that Mr. Galanis could receive a fair trial. But, because the government has continued an almost non-stop supply of Discovery on counsel way beyond the stated date that Discovery was supposed to have been completed, even with all the tools the Court has authorized, counsel cannot adequately prepare for the up coming trial date.

Mr. Galanis also has an individual reason similar to the request of Mr. Archer. As the Court might be aware a new book has just been released entitled "Greed & Fear: The Galanis Crime Family". This book centers its attention on John Galanis and if a trial starts at this time just as

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the release publicity is at its highest counsel fears that the jury pool would be tainted beyond repair. An adjournment of the trial date would allow the publicity to die down and the poisoning of the jury pool to dissipate.

Thank you for your attention to this matter.

Respectfully yours,



David Touger

cc: AUSA Rebecca Mermelstein